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Attorneys for Defendant
 UNITED PARCEL SERVICE, INC.

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

CHAUNCI BOYKIN,
 Plaintiff,

v.

UNITED PARCEL SERVICE, INC.; and
 DOES I - X,
 Defendants.

) Case No. 08-cv-04870-MMC (EMC)

)
) **STIPULATION RE RESOLUTION OF**
) **PLAINTIFF'S MOTION FOR**
) **PROTECTIVE ORDER RE PLAINTIFF'S**
) **DEPOSITION AND REQUEST FOR**
) **DECISION ON SHORTENED TIME; AND**
) **[PROPOSED] ORDER TAKING MOTIONS**
) **OFF CALENDAR**
)

The parties agree as follows:

1. Plaintiff filed a motion for a protective order regarding Plaintiff's deposition and a request for the motion to be decided on shortened time.

2. Counsel for the parties met again after the motion and opposition papers were filed and arrived at an agreement to resolve the motion, as set forth in this stipulation and proposed order.

3. For the scheduling of all future depositions, both parties will comply with the requirements of Local Rule 30-1.

4. Plaintiff's deposition will occur on February 23, 2009. Plaintiff agrees not to take the depositions of Defendant's witnesses prior to Plaintiff's Deposition on February 23, 2009.

5. Defendant's written response to Plaintiff's First Request for Production of Documents is due no later than February 17, 2009. Objections contained in the written response must be made in good faith and on an individualized basis.

6. Documents responsive to Plaintiff's First Request for Production of Documents are to be personally delivered to Plaintiff's counsel at the conclusion of Plaintiff's deposition on February 23, 2009. If, for any currently unforeseen reason, Plaintiff does not appear or is prevented from appearing at her deposition on February 23rd, the documents need not be delivered to her counsel until her deposition occurs on a continued date.

7. Based upon the foregoing, the parties agree that the pending Motion for Protective Order and request for that motion to be heard on shortened time may be taken off calendar.

DICKSON - ROSS LLP

Dated: January 22, 2009

By: /s/ Kathryn Burkett Dickson
KATHRYN BURKETT DICKSON
Attorneys for Plaintiff
CHAUNCI M. BOYKIN

PAUL HASTINGS JANOFISKY & WALKER LLP

Dated: January 22, 2009

By: /s/ Michael M. Pfyl
MICHAEL M. PFYL
Attorneys for Defendant
UNITED PARCEL SERVICE, INC.

ORDER

The Court has reviewed the stipulation of the parties, and finding good cause,
IT IS HEREBY ORDERED that based on the agreements reached by the parties, Plaintiff's
Motion for Protective Order re Plaintiff's Deposition and Plaintiff's request for expedited
decision on motion are hereby removed from the calendar.

IT IS SO ORDERED.

Date: January 23, 2009



Edward M. Chen
UNITED STATES DISTRICT MAGISTRATE